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Hearing Date: November 20, 2009
Hearing Time: 9:45 am

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.*,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

**NOTICE OF MOTION OF CERTAIN NOTEHOLDERS FOR AN ORDER
MODIFYING THE BAR DATE ORDER TO PROVIDE THAT NO PROOFS OF CLAIM
NEED BE FILED RELATED TO CERTAIN GUARANTEE CLAIMS AGAINST
MOTORS LIQUIDATION COMPANY OR, IN THE ALTERNATIVE, DEEMING THIS
MOTION A PROOF OF CLAIM AS TO SUCH CLAIMS, AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that on November 9, 2009, Aurelius Capital Management, LP; Drawbridge Special Opportunities Advisors, LLC; Fortress Credit Opportunities Advisors LLC; Appaloosa Management L.P.; Elliot Associates, LP; Perry Partners, L.P.; and Perry Partners International, Inc. (collectively, the “**Noteholders**”), filed their *Motion of Certain Noteholders for an Order Modifying the Bar Date Order to Provide that no Proofs of Claim Need be Filed Related to Certain Guarantee Claims against Motors Liquidation Company or, in the Alternative, Deeming this Motion a Proof of Claim as to Such Claims, and for Related Relief* (the “**Motion**”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion and entry of the proposed order annexed thereto shall be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 at the United States

Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”), Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004, on **Friday, November 20, 2009 at 9:45 a.m.**

PLEASE TAKE FURTHER NOTICE that responses, if any, to the Motion and the relief requested therein must be made in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the United States Bankruptcy Court for the Southern District of New York, and be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User’s Manual for the Electronic Case Filing System can be found at *www.nysb.uscourts.gov*, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and shall be served in accordance with General Order M-242 upon: (1) Greenberg Traurig LLP, 200 Park Avenue, New York, New York 10166, Attention: Bruce R. Zirinsky, Esq., Counsel for the Noteholders; (2) Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153, Attention: Harvey R. Miller, Esq. (facsimile 212-310-8007), counsel to the Debtors; (3) Kramer Levin Naftalis & Frankel LLP, 1177 Avenue of the Americas, New York, New York 10036, Attention: Thomas Moers Mayer, Esq. (facsimile 212-715-8000), counsel to the Unsecured Creditors' Committee; and (4) the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New York, 10004, Attention: Diana G. Adams, Esq./Brian Masumoto, Esq., so as to be actually received by no later than 4:00 p.m.

(prevailing Eastern Time) on November 17, 2009. Only those responses that are timely filed,
served and received will be considered at the hearing.

Dated: New York, New York
November 9, 2009

GREENBERG TRAURIG, LLP

By: /s/ Allen G. Kadish

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